

Tim Roberts, Esq.  
Dooley Roberts & Fowler LLP  
Suite 201, Orlean Pacific Plaza  
865 South Marine Corps Drive  
Tamuning, Guam 96913  
Telephone (671) 646-1222  
Facsimile (671) 646-1223

FILED  
Clerk  
District Court

NOV 16 2005

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

Eric Smith, Esq.  
Law Offices of Smith & Williams  
Former Mai Thai Building, Garapan  
Post Office Box 5133, CHRB  
Saipan, MP 96950  
Telephone (670) 233-3334  
Facsimile (670) 233-3336

Attorneys for Defendant  
Pro Marine Technology

IN THE UNITED STATES DISTRICT COURT  
  
FOR THE NORTHERN MARIANA ISLANDS

JOHN BRADY BARRINEAU	)	CIVIL ACTION NO. CV05-0028
	)	
Plaintiff,	)	
	)	
vs.	)	<b>PRO MARINE TECHNOLOGY'S PRE-</b>
	)	<b>DISCOVERY DISCLOSURE STATEMENT</b>
PRO MARINE TECHNOLOGY and	)	<b>[LR 16.d.; FED.R.CIV.P. 26(a) and (f)]</b>
CABRAS MARINE CORPORATION	)	
	)	
Defendants.	)	
_____	)	

(1) Initial Disclosures:

(A) The name, and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects:

Pro Marine Technology's Pre-Discovery Disclosure Statement  
[LR 16.D.; FED.R.CIV.P. 26(F)]  
*Barrineau vs. PMT Technology, et al.*  
Civil Case No. CV 05-0028  
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(i) Pro Marine Technology officers:

Ken Collard, telephone number (671) 789-7001

Chie Collard, telephone number (671) 789-7001

(ii) Pro Marine Technology employees:

Cary Rose, Francisco Javiar St., Hagatna, Guam 96932; telephone number  
(671) 477-2856

Christopher K. Shelton, Pale Kierian Street, Sinajana, Guam 96913,  
telephone number (671) 688-8189

Benedict J. Matanane, 194 Governor Carlos Camacho Road, Tamuning,  
Guam 96913; telephone number (671) 646-5533

Conald Jonah,

Vance S. Eflin

(iii) Other individuals likely to have discoverable information:

Dr. George Macris, M.D., Harmon Doctors' Clinic, Harmon, Guam

Naval Employees associated with the Navy's recompression chamber on  
Naval Base, Guam.

(iv) Pro Marine Technology continues to investigate this matter and reserves  
the right to identify other knowledgeable persons as discovery proceeds.

Pro Marine Technology's Pre-Discovery Disclosure Statement  
[LR 16.D.; FED.R.CIV.P. 26(F)]  
*Barrineau vs. PMT Technology, et al.*  
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(B) A copy of, or a description by category and location of, all documents, data compilations and tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

(i) Investigation into what documents, data compilations or tangible things Pro Marine Technology may use to support its claims is still ongoing. At a minimum, however, Pro Marine Technology is in possession of all of the equipment Plaintiff was using on the day of the accident giving rise to suit, all of which is familiar to Plaintiff.

(C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

(i) Not applicable.

(D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

(i) Pro Marine Technology is in possession of two (2) potentially applicable insurance policies, both of which have been mailed to Plaintiff's counsel.

Pro Marine Technology's Pre-Discovery Disclosure Statement  
[LR 16.D.; FED.R.CIV.P. 26(F)]  
*Barrineau vs. PMT Technology, et al.*  
Civil Case No. CV 05-0028  
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(2) Disclosure of Expert Testimony.

(A) At this time Pro Marine Technology has not retained any expert witnesses. From conversations with Plaintiff's counsel, however, Pro Marine anticipates that it will be retaining experts in the fields of psychology and psychiatry.

(B) Not currently applicable.

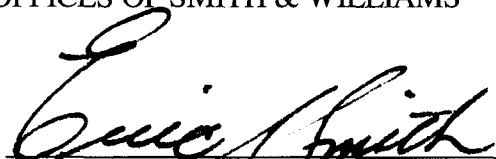
(C) Not currently applicable.

DOOLEY ROBERTS & FOWLER LLP  
LAW OFFICES OF SMITH & WILLIAMS

Dated:

Nov 16, 2005

By:

  
\_\_\_\_\_  
TIM ROBERTS, ESQ.  
ERIC SMITH, ESQ.  
Attorneys for Defendant PMT